



CoCa Mines, Inc.

6500 North Mineral Drive, Suite 200
Coeur d'Alene, ID 83815-9408
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Sharon Abendschan
U.S. EPA Region 8
Technical Enforcement Program, 8ENF-RC
1595 Wynkoop Street
Denver, CO 80202

Re: *Response to Request for Information Pursuant to CERCLA Section 104(e);
Gilt Edge Mine Site, Lawrence County, South Dakota*

Dear Ms. Abendschan:

CoCa Mines, Inc. ("CoCa") is transmitting herewith relevant documents responsive to the EPA's Request for Information on the subject-referenced property. If you have any questions or comments concerning this matter, please contact Michael Clary at telephone number 208.769.4146, or at email address mclary@hecla-mining.com.

Sincerely,

Ann Robison
Property and Contract Coordinator

Enclosures



CoCa Mines, Inc.

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**CoCa Mines, Inc.'s Response
United States Environmental Protection Agency Region 8
Request for Information
Gilt Edge Mine Site - Lawrence County, South Dakota
October 2, 2008**

Sharon Abendschan
U.S. EPA Region 8
Technical Enforcement Program, 8ENF-RC
1595 Wynkoop Street
Denver, CO 80202

Re: *Response to Request for Information Pursuant to CERCLA Section 104(e);
Gilt Edge Mine Site, Lawrence County, South Dakota*

Dear Ms. Abendschan:

CoCa Mines, Inc. ("CoCa") is responding to the United States Environmental Protection Agency's ("EPA") August 14, 2008 Request for Information, for the Gilt Edge Mine Site, Lawrence County, South Dakota (the "Request"). CoCa's specific responses to EPA's questions are set forth below. CoCa has used its reasonable best efforts to locate documents responsive to EPA's Request. With the exception of certain over-sized maps, diagrams, and technical documents which will be made available to EPA upon reasonable notice, relevant documents responsive to the Request have been enclosed with these responses.

CoCa has conducted an extensive search for documents that may be responsive to the Request. Due to the number of places where responsive documents may have been stored, and because a majority of the requested documents appear to have originated more than twenty-five years ago, CoCa does not represent that every document possibly responsive to these requests has been, or can be, located. In the event that additional relevant, responsive documents in CoCa's possession as of the date of the request are located, they will be made available to the EPA.

These responses and the documents provided with these responses do not constitute an admission by CoCa of liability with respect to the Gilt Edge Mine Site ("Site"), nor any admission or representation concerning the conditions on or surrounding the Site or any acts or omissions of any persons concerning the Site. CoCa's production of documents does not constitute an admission that the contents of the documents provided are true, correct, or accurate, nor does it constitute an admission that the documents are authentic for the purposes of admissibility in any judicial or administrative proceeding. These responses do not constitute an admission by CoCa that it or anyone

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employed by it, or its parents, predecessors or subsidiaries, generated, transported, or disposed of any hazardous wastes or substances, pollutants, or contaminants anywhere at the Site. CoCa denies that it has any liability relating to any releases or threatened releases at the Site.

Based upon information available to it, CoCa responds as follows:

I. General Objections

1. CoCa objects to the requests on the grounds that they are overbroad and vague.
2. CoCa objects to the requests to the extent that they seek information or documents that are protected under the attorney-client privilege, the work product doctrine or any other available privilege or protection.
3. CoCa objects to the requests to the extent that they call for legal conclusions.
4. CoCa objects to the requests to the extent that they attempt to impose upon CoCa an obligation to obtain information from third persons or others where the law does not impose such an obligation.
5. CoCa objects to the requests to the extent that they seek information beyond the scope permitted by 42 U.S.C. § 9604(e). Under section 9604(e), the President may only request information relating to (1) the identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at a facility or transported to a facility; (2) the nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a facility; or (3) the ability to pay for or perform a cleanup. See 42 U.S.C. § 9604(c)(2).

II. Objections to Instructions and Definitions

1. CoCa objects to instruction No. 4, requiring that each document produced indicate the number of the question to which it relates, as vague and unduly burdensome. CoCa is providing a number of documents with these responses, and each document may be relevant to several questions. EPA is in the best position to evaluate the relevance of each document in regard to its own questions.
2. CoCa objects to the definitions of "Respondent" and "you" as overly broad, vague and ambiguous.

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3. CoCa objects to the definitions of “pollutant or contaminant,” “hazardous wastes,” and “materials” as vague, overly broad and internally inconsistent. In addition, CoCa objects to these terms because they improperly require legal conclusions.

4. CoCa objects to EPA’s definitions of “identify” as overly broad and unduly burdensome, and because they may require CoCa to provide information outside the scope of 42 U.S.C. § 9604(e). With respect to the identification of specific documents, CoCa states that each document speaks for itself.

5. CoCa objects to the definitions of “document” and “documents” as overly broad, vague, ambiguous and unduly burdensome, and because these definitions may require CoCa to provide information outside the scope of 42 U.S.C. § 9604(e). In addition, CoCa objects to these definitions because they attempt to impose an obligation to provide EPA with information not in CoCa’s custody or control.

6. CoCa objects to EPA’s definition of “ore” as vague, ambiguous and so broad as to be meaningless.

7. CoCa objects to EPA’s definition of “property interest” as vague, overly broad, ambiguous, unduly burdensome and because it potentially requires CoCa to provide information beyond the scope of 42 U.S.C. § 9604(e). In addition, CoCa objects to this term because it improperly requires a legal conclusion.

8. CoCa objects to EPA’s definition of “Site” as vague and ambiguous.

III. Responses

CoCa reserves the right to amend its answers if and when additional information becomes available which is relevant to this Request. CoCa incorporates each of its *General Objections and Objections to Instructions and Definitions* into each response provided below. Without waiving these objections or admitting any liability with respect to the Site, CoCa answers as follows:

Question 1: Identify the person(s) answering these Questions on behalf of the Respondent.

Response to Question 1: The answers to these questions were prepared by the following persons:

Ronald W. Clayton
President, CoCa Mines, Inc.

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Question 2: For each and every Question contained herein, identify all persons consulted in the preparation of the answer.

Response to Question 2: CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. CoCa also objects to Question 2 as unduly burdensome and because it requires the production of information beyond the scope of 42 U.S.C. § 9604(e). Without waiving its objections, CoCa states that persons consulted in the preparation of these responses include:

Scott Hardt
Joseph G. Middleton
Temkin Wielga Hardt & Longenecker LLP
1900 Wazee Street, Suite 303
Denver, CO 80202

Mike Clary
Ann Robison
Hecla Limited
6500 N. Mineral Drive, Suite 200
Coeur d'Alene, ID 83815-9408

Question 3: For each and every Question contained herein, identify documents consulted, examined, or referred to in the preparation of the answer or that contain information responsive to the Question and provide accurate copies of all such documents.

Response to Question 3: CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. CoCa also objects to Question 3 as unduly burdensome and requiring the production of information beyond the scope of 42 U.S.C. § 9604(e). Without waiving its objections, CoCa states that it is providing, with these responses, relevant documents it has located and reviewed in order to respond to EPA's Request. EPA may determine the relevance of each document to its particular Questions.

Question 4: Describe the operations the Respondent conducted at the Site including the following:

Question 4(a): The dates of operation.

Response to Question 4(a): CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. In addition, CoCa objects

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to the terms "operation" and "operations" as undefined, vague and ambiguous, and because those terms require CoCa to draw legal conclusions. Without waiving its objections, CoCa states that, to the best of its knowledge, it did not conduct operations at the Site.

Question 4(b): The physical changes made to the Site.

Response to Question 4(b): CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. In addition, CoCa objects to the term "physical changes" as undefined, vague and ambiguous. Without waiving any of its objections, CoCa states that, to the best of its knowledge, it did not make physical changes at the Site.

Question 4(c): The mining and mineral processing activity conducted at the Site, including but not limited to exploration activities.

Response to Question 4(c): CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. In addition, CoCa objects to the term "mining and mineral processing activity" as undefined, vague and ambiguous. Without waiving any of its objections, CoCa states that, to the best of its knowledge, it did not conduct mining or mineral processing activities at the Site. Cyprus Mines Corporation ("Cyprus"), as the party given "full, complete and exclusive control and supervision" of all "exploration, development and production operations" at the Site under the terms of its 1975 joint venture agreement with Congdon and Carey Ltd. 5 conducted a limited program of exploration drilling and metallurgical testing between approximately 1976 and 1983. CoCa is providing, with these responses, relevant information it has located to-date which describes the activities that took place during this general time frame.

Question 4(d): Other entities the Respondent partnered with to perform Site operations.

Response to Question 4(d): CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. In addition, CoCa objects to the terms "partnered" and "operations" as undefined, vague and ambiguous, and because they call for legal conclusions. Without waiving these objections, CoCa states that, to the best of its knowledge, it did not perform operations at the Site. CoCa is unaware of any partnership between itself and any other entities during the relevant time frame. CoCa was involved in a joint venture with Cyprus.

Question 4(e): The activities taken upon cessation of operations at the Site related to reclamation and restoration.

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Response to Question 4(e): CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. In addition, CoCa objects to the terms "operations," "reclamation," and "restoration" as undefined, vague and ambiguous, and because they require legal conclusions. Without waiving its objections, CoCa states that it, to the best of its knowledge, did not conduct operations at the Site. CoCa is unaware of the specific actions taken upon cessation of operations at the Site related to reclamation and restoration.

Questions 5 (a)-(e): Describe and where available, provide maps and construction drawings that depict the physical characteristics of the Site and all changes that Respondent made at the Site, including but not limited to the following:

- a. Surface structures (e.g., buildings, tanks, etc.);
- b. Exploration drill holes, ground water wells, including drilling logs;
- c. Ore repositories, heap leach pads, and mine waste impoundments;
- d. Shafts, adits, and tunnels or other excavations;
- e. Roads.

Response to Questions 5(a)-(e): CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. In addition, CoCa objects to Questions 5(a)-(e) as vague, overly broad, unduly burdensome and requiring the production of information beyond the scope of 42 U.S.C. § 9604(e). Without waiving its objections, CoCa states that, to the best of its knowledge, it did not make changes to the Site's physical characteristics. As set forth above, Cyprus was the sole party authorized to engage in the activities described in Question 5(a)-(e). CoCa is providing, with these responses, relevant documents it has located to-date which are responsive to Questions 5(a)-(e).

Question 6: Describe all waste materials that resulted from Respondent's operations at the Site including, but not limited to, waste rock, tailings, spent ore, and treatment plant sludges. State the quantities produced of each such waste. Describe where each such waste was disposed of. Identify any hazardous substances contained in such wastes and provide copies of any and all documents that describe any analysis of such wastes and the results of the analysis.

Response to Question 6: CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. In addition, CoCa objects to Question

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6 as unduly burdensome and requiring the production of information beyond the scope of 42 U.S.C. § 9604(e). Without waiving its objections, CoCa states that, to the best of its knowledge, it did not conduct operations at the Site.

Question 7: Provide copies of any and all permits issued by State or Federal agencies related to Respondent's operations at the Site, including permits Respondent obtained on behalf of any other entities.

Response to Question 7: CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. CoCa also objects to Question 7 as unduly burdensome and requiring the production of information beyond the scope of 42 U.S.C. § 9604(e). Without waiving its objections, CoCa states that, to the best of its knowledge, it did not conduct operations at the Site and, to the best of its knowledge, did not acquire any permits on behalf of any other entities for activities related to the Site. CoCa is providing, with these responses, relevant information it has located to-date which is responsive to Question 7.

Question 8: Identify the entity that held recorded title to the Site during the period of CoCa's operations at the Site. Provide the following information:

Response to Question 8: CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. CoCa also objects to Question 8 as unduly burdensome and requiring the production of information beyond the scope of 42 U.S.C. § 9604(e). In addition, CoCa objects to Question 8 to the extent it requires CoCa to make any legal conclusion regarding the status of title to particular properties. Without waiving its objections, CoCa states that, to the best of its knowledge, it did not conduct operations at the Site. CoCa is providing, with these responses, relevant information it has located to-date regarding entities which held recorded title to the property encompassed by the Site.

Question 8(a): The date Respondent acquired the property.

Response to Question 8(a): CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. Without waiving its objections, CoCa states that, to the best of its knowledge, its predecessor, Congdon and Carey Ltd. 5, first acquired an interest in certain patented and unpatented mining claims at the Site under a lease executed in 1974. The specific date CoCa or its predecessors acquired any other interests in the various properties encompassed by the Site is set forth in the documents which CoCa is providing with these responses.

Question 8(b): Identify the party from whom Respondent acquired the property;

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Response to Question 8(b): CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. Without waiving its objections, CoCa states that Congdon and Carey, Ltd. 5's interest under the 1974 lease was granted to it by the Commonwealth Mining Company. The other specific entities CoCa obtained relevant interests from are set forth in the documents which CoCa is providing with these responses.

Question 8(c): Provide a copy of the deed or other instrument by which CoCa acquired the property.

Response to Question 8(c): CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. Without waiving its objections, CoCa states that it is providing, with these responses, copies of relevant documents responsive to Question 8(c).

Question 9: Describe all property interests that CoCa currently owns or has previously owned at the Site, including the following information. To the extent the information requested below is provided in deeds or other documents submitted with your response to this Request, you need not include the information in your narrative response.

Response to Question 9: CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. In addition, CoCa objects to Question 9 as unduly burdensome and requiring the production of information beyond the scope of 42 U.S.C. § 9604(e). In addition, CoCa objects to Question 9 because it requires CoCa to draw legal conclusions regarding the status of property interests at the Site. Without waiving its objections, CoCa states that any property interests it previously held at the Site are specifically described in the documents produced with these responses. CoCa has no current property interests at the Site.

Question 9(a): *Provide the legal description of the properties owned.*

Response to Question 9(a): CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. Without waiving its objections, CoCa states that its response to Question 9(a) is set forth in its response to Question 9, above.

Question 9(b): Describe the nature of the interest CoCa own(ed), (i.e. surface, mineral, surface and mineral, fractional ownership, fee title, leasehold, option to buy);

Response to Question 9(b): CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. Without waiving its

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objections, CoCa states that its response to Question 9(b) is set forth in its response to Question 9, above.

Question 9(c): Identify the entity from which Respondent acquired the interest, and the date you acquired it.

Response to Question 9(c): CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. Without waiving its objections, CoCa states that its response to Question 9(c) is set forth in its response to Question 9, above.

Question 9(d): If Respondent has sold or in any manner transferred property at the Site, identify the person to whom Respondent sold or transferred property, describe the property sold or transferred, and provide the date of the sale or transfer.

Response to Question 9(d): CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. Without waiving its objections, CoCa states that its response to Question 9(d) is set forth in its response to Question 9, above.

Question 9(e): If CoCa owns a fractional interest in any property at the Site, describe the property sold or transferred, and provide the date of the sale or transfer.

Response to Question 9(e): CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. Without waiving its objections, CoCa states that its response to Question 9(e) is set forth in its response to Question 9, above.

Question 9(f): Please provide copies of all deeds or other conveying instruments by which CoCa acquired or transferred title to property at the Site.

Response to Question 9(f): CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. Without waiving its objections, CoCa states that it is providing, with these responses, relevant documents it has located to-date which are responsive to Question 9(f).

Question 10: If Respondent leased the property, provide copies of all lease agreements.

Response to Question 10: CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. Without waiving its

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objections, CoCa states that it is providing, with these responses, relevant documents it has located to-date which are responsive to Question 10.

Question 11: If CoCa has conducted any mining activity at the Site, or conducted any activity at the Site that involved excavation, grading, filling, drilling or other earth moving, describe those activities including the date of the activity and the area of the Site on which it occurred. Identify the individuals responsible for such activities at the Site. Provide all documentation pertaining to such activity.

Response to Question 11: CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. CoCa also objects to Question 11 as unduly burdensome and requiring the production of information beyond the scope of 42 U.S.C. § 9604(e). In addition, CoCa objects to the term "mining activity" as undefined, vague and ambiguous. Without waiving its objections, CoCa states that, to the best of its knowledge, it did not conduct mining activity at the Site, or activities that involved excavation, grading, filling, drilling or other earth moving. CoCa has no knowledge of the specific individuals responsible for those activities at the Site.

Question 12: Provide all documentation pertaining to drill holes, including borehole logs, geological logs, location maps, and any information relating to the results and analysis of the drilling that was done at the Site by Respondent and/or its contractors.

Response to Question 12: CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. In addition, CoCa objects to Question 12 as unduly burdensome and requiring the production of information beyond the scope of 42 U.S.C. § 9604(e). Without waiving its objections, CoCa states that, to the best of its knowledge, CoCa did not conduct or hire any contractor to conduct drilling at the site. CoCa is providing, with these responses, relevant information it has located to-date which is responsive to Question 12.

Question 13: Provide all existing technical or analytical information in your possession about the Site, including, but not limited to, data and documents related to soil, water (ground or surface), geology, geohydrology or air quality on and about the Site.

Response to Question 13: CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. In addition, CoCa objects to Question 13 as unduly burdensome and requiring the production of information beyond the scope of 42 U.S.C. § 9604(e). Without waiving its objections, CoCa states that it is providing, with these responses, relevant information it has located to-date which is responsive to Question 13. Certain oversized maps, diagrams and other data will be made available to EPA upon reasonable notice.

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Question 14: Provide copies of project authorization proposals and/or status and planning reports for Respondent's operations at the Site. Identify the person(s) who prepared these reports and his/her role(s) at the Site.

Response to Question 14: CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. In addition, CoCa objects to Question 14 as unduly burdensome and requiring the production of information beyond the scope of 42 U.S.C. § 9604(e). Without waiving its objections, CoCa states that, to the best of its knowledge, it did not conduct operations at the Site. CoCa is providing, with these responses, relevant information it has located to-date which is responsive to Question 14. CoCa has no other relevant knowledge regarding the preparation of project authorization proposals at the Site.

Questions 15(a)-(f): Describe the organizational history, corporate history, and successorship of Congdon & Carey, Ltd. 5 and CoCa Mines, Inc. Provide documents and agreements to support your description. Include the following information in your description:

- a. Dates, countries, and states/provinces of incorporation;
- b. Any record of partnership, article of incorporation; record of dissolution;
- c. The relationship between Congdon & Carey, Ltd. 5 and CoCa Mines, Inc.
- d. The relationship between CoCa Mines, Inc., and Hecla Mining Company.
- e. The directors and executive officers, including managers, of Congdon & Carey, Ltd. 5 and CoCa Mines, Inc. during the time of operations at the Site; describe each individual's respective role(s) at the Site; and
- f. The dates and terms of all mergers, acquisitions, and name changes that Congdon & Carey, Ltd. 5 and CoCa Mines, Inc., have been a party to since their establishment.

Response to Questions 15(a)-(f): CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. In addition, CoCa objects to Question 15 as overly broad, unduly burdensome and requiring the production of information beyond the scope of 42 U.S.C. § 9604(e). Without waiving its objections, CoCa states that, to the best of its knowledge, it did not conduct operations at the Site. Congdon & Carey, Ltd. 5 was organized as a limited partnership under the laws of

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Colorado on July 1, 1974. Effective December 31, 1982, CoCa Mines, Inc., a Delaware corporation, St. Mary Parish Land Company, a Delaware corporation, and Congdon & Carey, Ltd. 5, a Colorado limited partnership, formed a new corporation, CoCa Mines, Inc., a Colorado corporation ("CoCa"). In 1986, CoCa merged with and into Minerals Engineering Company ("MECO"), a Colorado corporation, and MECO changed its name to CoCa Mines, Inc. Effective June 26, 1991, CoCa Mines, Inc., merged with CM Acquisition Company, a wholly owned subsidiary of Hecla Mining Company, and CM Acquisition Company changed its name to CoCa Mines, Inc. Hecla Mining Company changed its name to Hecla Limited effective November 8, 2006. CoCa Mines, Inc. is a wholly owned subsidiary of Hecla Limited.

CoCa is providing, with these responses, relevant documents it has located to-date which are responsive to Questions 15(a)-(f).

Question 16: Identify the individual(s) who was responsible for approving budgets for planned operations at the Site on behalf of Respondent. Provide copies of those budgets for planned operations at the Site.

Response to Question 16: CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. CoCa also objects to Question 16 as unduly burdensome and requiring the production of information beyond the scope of 42 U.S.C. § 9604(e). In addition, CoCa objects to the term "planned operations" as undefined, vague and ambiguous. Without waiving its objections, CoCa states that, to the best of its knowledge, it did not conduct operations at the Site. CoCa is unaware of the specific individuals who were responsible for approving budgets for planned operations at the Site. CoCa is providing, with these responses, copies of relevant documents it has located to-date which are responsive to Question 16.

Question 17: Identify the individual(s) who managed, directed, and/or conducted operations at Site on behalf of Respondent related to hazardous waste and/or decisions about compliance with environmental regulations. Provide copies of documents related to hazardous waste and/or decisions about compliance with environmental regulations at the Site.

Response to Question 17: CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. In addition, CoCa objects to the term "operations" as undefined, vague and ambiguous. CoCa also objects to Question 17 to the extent that it requires CoCa to draw legal conclusions regarding the status of any individual as an operator under 42 U.S.C. § 9607. Finally, CoCa objects to Question 17 as unduly burdensome and requiring the production of information beyond the scope of 42 U.S.C. § 9604(e). Without waiving its objections, CoCa states that, to the best of its knowledge, it did not conduct operations at the Site, and is unaware of the specific

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individual(s) who managed, directed, and/or conducted operations at Site and/or decisions about compliance with environmental regulations. CoCa is providing, with these responses, relevant documents it has located to-date which are responsive to Question 17.

Question 18: Provide all information related to the partnership between Cyprus Mines Corporation and Congdon & Carey, Ltd. 5 which provided that all expenses and profits arising from operations at the Site were to be divided 80 percent to Cyprus Mines Corporation and 20 percent to Congdon & Carey, Ltd. 5. Provide copies of such agreements and any related documents.

Response to Question 18: CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. CoCa also objects to Question 18 as vague, overly broad and unduly burdensome, and requiring the production of information beyond the scope of 42 U.S.C. § 9604(e). In addition, CoCa objects to EPA's characterization of the relationship between Cyprus and Congdon & Carey, Ltd. 5 as a partnership. Without waiving its objections, CoCa states that it is providing, with these responses, relevant documents it has located to-date which are responsive to Question 18.

Question 19: Provide all information, including documents, relating to CoCa Mines, Inc.'s participation in the partnership with Cyprus Mines Corporation, or any other agreement entered into by CoCa Mines, Inc. that pertained to Site ownership, operations, or reclamation or other activities at the Site.

Response to Question 19: CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. CoCa also objects to Question 19 as vague, overly broad, unduly burdensome and requiring the production of information beyond the scope of 42 U.S.C. § 9604(e). In addition, CoCa objects to the terms "ownership," "operations," and "reclamation or other activities" as undefined, vague, ambiguous and so broad as to be meaningless. Finally, CoCa objects to EPA's characterization of the relationship between Cyprus and CoCa as a partnership. Without waiving its objections, CoCa states that, to the best of its knowledge, it did not conduct operations at the Site. CoCa is providing, with these responses, relevant documents it has located to-date which are responsive to Question 19.

Question 20: Identify companies or individuals that the Respondent hired to perform work at the Site. Provide all documentation, including contracts, pertaining to this work. Include information about the purpose of and documentation related to Respondent's contracts at the Site.

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Response to Question 20: CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. CoCa also objects to Question 20 as unduly burdensome and requiring the production of information beyond the scope of 42 U.S.C. § 9604(e). Without waiving its objections, CoCa states that, to the best of its knowledge, it did not conduct operations at the Site. CoCa is unaware of any contracts between itself and any other entities regarding activities performed at the Site.

Question 21: Provide all information, including documents, related to Respondent's efforts to conduct remedial work on abandoned tailings at the Site. Identify the individual(s) responsible for such effort and the activities undertaken, if any, related to the remedial work.

Response to Question 21: CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. In addition, CoCa objects to the terms "remedial work" and "abandoned tailings" as undefined, vague and ambiguous. CoCa also objects to Question 21 as unduly burdensome and requiring the production of information beyond the scope of 42 U.S.C. § 9604(e). Without waiving its objections, CoCa states that, to the best of its knowledge, it did not conduct any remedial work on abandoned tailings at the Site. CoCa has no knowledge of the specific individuals responsible for any remedial work on abandoned tailings at the Site.

Question 22: Provide all information, including documents, related to Respondent's efforts to reclaim the experimental heap leach at the Site. Identify the individual(s) responsible for such effort and the activities undertaken, if any, related to the reclamation.

Response to Question 22: CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. CoCa also objects to Question 22 as unduly burdensome and requiring the production of information beyond the scope of 42 U.S.C. § 9604(e). Without waiving its objections, CoCa states that it, to the best of its knowledge, did not undertake any efforts to reclaim the experimental heap leach at the Site. CoCa is unaware of the specific activities undertaken to reclaim any heap leach at the Site, or of the specific individuals responsible for efforts to reclaim any heap leach at the Site.

Question 23: Provide all information, including documents, relating to the cause, assessment, and remediation of sedimentation at the Strawberry Creek during the period of Respondent's operations at the Site. Include in your answer all information, including documents, related to the construction of a permanent settling impoundment below the tailings to keep material from reaching Strawberry Creek; construction of a temporary settling impoundment in lower Strawberry Creek; and removal of the eroded tailings from Strawberry Creek by Respondent.

CoCa Mines, Inc.'s Response
United States Environmental Protection Agency Region 8
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October 2, 2008

Response to Question 23: CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. CoCa also objects to Question 23 as unduly burdensome and requiring the production of information beyond the scope of 42 U.S.C. § 9604(e). Without waiving its objections, CoCa states that, to the best of its knowledge, it did not conduct operations at the Site. CoCa has no knowledge regarding the cause, assessment, or remediation of sedimentation at Strawberry Creek.

Question 24: Identify whether Respondent obtained insurance for environmental liability at the Site. If so, provide all information related to such contract(s), including copies of the insurance document(s).

Response to Question 24: CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. CoCa also objects to Question 24 as unduly burdensome and requiring the production of information beyond the scope of 42 U.S.C. § 9604(e). Without waiving its objections, CoCa states that it is not aware of any environmental liability insurance relating to the Site.

Question 25: If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Question contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

Response to Question 25: CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. CoCa also objects to Question 25 as unduly burdensome and requiring the production of information beyond the scope of 42 U.S.C. § 9604(e). Without waiving its objections, CoCa states that it is unaware of any persons who could provide a more detailed or complete response to any Question in the Request.

Question 26: For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody or control, then identify the persons from whom such information or documents may be obtained.

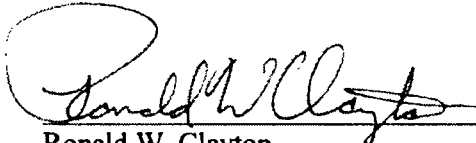
Response to Question 26: CoCa incorporates by reference its General Objections and its Objections to Instructions and Definitions. CoCa also objects to Question 26 as unduly burdensome and requiring the production of information beyond the scope of 42 U.S.C. § 9604(e). Without waiving its objections, CoCa states that, aside from the information it is providing with these responses, it is unaware of any relevant information responsive to EPA's Request.

CoCa Mines, Inc.'s Response
United States Environmental Protection Agency Region 8
Request for Information
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October 2, 2008

NOTARIZED CERTIFICATE
GILT EDGE MINE SITE

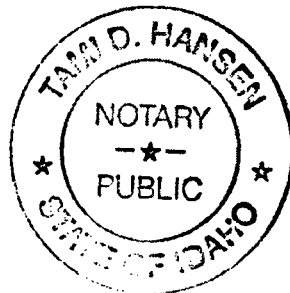
I, Ronald W. Clayton, hereby state:


1. I am the person authorized by CoCa to respond to the Environmental Protection Agency's (EPA's) request for information concerning the Gilt Edge Mine Site located in Lawrence County, South Dakota.
2. CoCa has made a good faith attempt to search for documents and information relevant to the Request.
3. Subject to the Objections and limitations stated above, I hereby certify that to the best of my knowledge, the attached response to EPA's Request is complete, and contains relevant information responsive to the Request which CoCa has located to-date.
4. CoCa Mines, Inc., reserves the right to supplement this Information Request if information or documents not currently known or available to CoCa should later become known or available.



Ronald W. Clayton
President, CoCa Mines, Inc.

Subscribed and sworn to before me this 2nd day of October, 2008.





Notary Public
Residing at 216 Exchange Way
My Commission Expires: 01-12-09